

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

IN RE COMBINED WORLD TRADE
CENTER AND LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102/103 (AKH)

NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: All Defendants in Master Dockets 21MC100, 21MC102 and 21MC103

PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendants, to the extent named as a defendant in any of the below referenced actions, to respond within thirty (30) days to the following demands for document production and information with reference to these plaintiffs:

Plaintiff	Index
Kwasnik, Wladyslaw	07-cv-11291
Matuszewski, Piotr	06-cv-1514
Sanchez, Alex Anthony	05-cv-1091
Vynar, Mykhalo	08-cv-6809
Kowalewski, Janusz	10-cv-6882
Sienkiewicz, Robert	10-cv-6711
Zalewski, Boguslaw	06-cv-1525

- 1) Any and all records referencing the above plaintiffs within your possession, including but not limited to medical records, employment records, work records, work logs, sign in sheets, attendance sheets, crew sheets, and City, State and/or Federal created and/or maintained records including but not limited to NYCDEP and OSHA.
 - a) If none, so state.

b) To the extent that a Defendant has previously provided records specific to any of the above plaintiffs, please reference:

i. date of service of same.

c) To the extent that a Defendant has previously uploaded such records to any database utilized in this litigation, please indicate


i. To which data base(s) has such been uploaded including respective date(s) and bates number(s)

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation

Dated: New York, New York
June 29, 2012

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs- Liaison Counsel

By: _____


Robert A. Grochow, Esq.
233 Broadway, 5th Floor
New York, New York 10279-0003
(212) 553-9205